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January 21, 2022

Via ECF

Honorable Sarah Netburn
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

Re: Sanchez et al. v. Art *1, Inc. et al. - 20-cv-05623 (ER)

Dear Judge Netburn:

Our firm represents Defendants, Art + 1, Inc. and Mr. Artan Maksuti in the above referenced matter. We write to you regarding our concern over the last three months that Plaintiffs' counsel has unnecessarily delayed reviewing and drafting the Settlement Agreement and Release, the Notice to Class Members and a Chart of payouts to Class Members, despite our good faith efforts to be responsive and provide necessary class member information to them.

Since November 2021, we have continued to request that Plaintiffs' counsel provide us with their revisions to the Settlement Agreement and were met with repeated unfulfilled promises to deliver said revisions, or with a lack of follow-up by Plaintiffs' counsel.

January 24, 2022 is the latest deadline that Your Honor provided, which is the second extension Plaintiffs' counsel had requested. Both times, they acknowledged the delay in the process was theirs alone, yet the delays have continued.

We request that Your Honor provide only a two week extension to require Plaintiffs' counsel to now address the related documents and act in good faith to resolve any issues, new or old, so that we may ensure filing of the proposed documents to you for review no later than February 8, 2022. If these delays continue, we ask that you provide us with a date and time during the week of February 7, 2022, for a conference call to address any outstanding issues or the Plaintiffs' counsel pattern of delay.

We thank the Court for its time and attention to the within response.

Respectfully Submitted,

THE KAGAN LAW GROUP, P.C.

By: /s/Linda S. Kagan, Esq.

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